



November 3, 1997

Mr. Thomas Alcamo
U.S. EPA Region 5
77 W. Jackson Blvd. SR-6J
Chicago, IL 60604-3590

RE: Engineering Evaluation/Cost Analysis Sampling Plan for the Master Metals Site,
Cleveland, Ohio

Dear Mr. Alcamo:

This document is being written in response to U.S. EPA comments on the Engineering Evaluation/Cost Analysis (EE/CA) Sampling Plan. U.S. EPA's comments were originally dated October 15, 1997. However, U.S. EPA has established the deliverable timeframe referenced in the Administrative Order to begin on October 27, 1997. On this date, U.S. EPA notified ENTACT that Ohio EPA had no comments on the EE/CA Sampling Plan.

ENTACT responses are presented as follows:

U.S. EPA comment: In review of Figure 2-1 and the subsequent sampling completed after the excavation for the removal action, many areas on-site appear to be contaminated with lead over 1000 parts per million. A major concern is the sampling at depth in which lead concentrations are excessively high within a mixture of slag material. Research on lead contamination within slag shows that lead is in the range of 20 parts per million for blast furnace slag and steel slag. This information indicates that site operations have affected the area below the site.

Response: During the removal action, ENTACT removed a railroad spur and associated fill materials along the western property boundary. These fill materials ranged from sand to white sludge-like material. It is clear that some material which was excavated from the western property boundary was operations-derived fill as opposed to native materials. However, it cannot be determined when the materials were deposited or by whom.

U.S. EPA comment: The proposed on-site 3-foot boring locations, referenced in Figure 3-1 are acceptable. One per boring laboratory analysis for arsenic, cadmium, chromium, and lead is also acceptable. The criteria that the first sample less than 1000 ppm for lead by screening with XRF



is sufficient. Please be aware that depending on the analytical results, additional sampling may be required to verify the nature and extent of contamination.

Response: ENTACT has prepared a sampling and analysis scheme which will address the current data gaps noted in reviewing the historical data. However, ENTACT is aware that the information collected in this sampling event may result in additional data gaps which may or may not warrant additional data collection.

U.S. EPA comment: The on-site and perimeter XRF surface samples, referenced in Figure 3-1 are acceptable.

Response: No response necessary.

U.S. EPA comment: ENTACT's statement that groundwater in the area of MMI will not be a source of drinking water is correct. The concern is that groundwater from the Master Metals site is contaminated with lead and other metals and could reach the Cuyahoga River. Please notify the U.S. EPA immediately if the four CTI wells cannot be located.

Response: The vast majority of lead contamination found at the site is located above the water table. In addition, lead mobility from solid materials is relatively slow. Therefore, it is unlikely that lead contaminated material found during the Phase I excavation would migrate to the groundwater and subsequently to the Cuyahoga River.

Currently, ENTACT is attempting to determine the locations of the existing well locations. ENTACT will notify U.S. EPA of the results of this investigation shortly.

U.S. EPA comment: The schedule in Section 4 states the EE/CA will be submitted for review 5 weeks after the investigation. The Statement of Work (SOW) describes an EE/CA Data Report to be submitted pursuant to a schedule in the Sampling and Analysis Plan (SAP). This schedule should be revised to reflect the SOW. In addition, please estimate a date when the field investigation will begin after approval of the SAP

Response: The project schedule has been updated to reflect 1) the start date for the EE/CA (the week of November 10, 1997), and 2) clarification of work items 4 and 5 (EE/CA Data Report Preparation and EE/CA Data Report Submittal for Review/Approval, respectively). An updated project schedule has been included with this correspondence.

If you have any questions please contact me at (630) 616-2100.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Michael DeRosa".

Michael DeRosa

ENTACT

Enclosure

cc: Master Metals Technical Committee